

EXHIBIT 7

**To
PLAINTIFF NICOLE HARRIS'S MOTION TO COMPEL DISCOVERY
RESPONSES FROM THE CITY OF CHICAGO**

November 2, 2015

Case No. 1:14-cv-4391



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October 7, 2015

VIA ELECTRONIC MAIL

Stuart J. Chanen and Nicole N. Auerbach
Valorem Law Group
35 E. Wacker Dr., Suite 3000
Chicago, Illinois 60601

Re: *Harris v. City of Chicago, et al.*,
No. 14 CV 4391

Dear Counsel:

We are writing in response to your letters, sent to us on October 1, 2015, regarding the City of Chicago's (the "City") responses to Plaintiff Nicole Harris's ("Plaintiff") discovery requests.

First, addressing Plaintiff's Second Request for Production of Documents (the "Requests"), we are aware of our obligation to timely supplement our response to document requests if and when additional documents become available. The City is a large municipality that fields hundreds, if not thousands, of requests for documents and similar information, and can only respond as quickly as resources allow. We anticipated that the City might not have been able to provide all of the requested documents to us prior to the City's discovery response deadline, which is why we requested an extension until October 14, 2015. However, you only agreed to extend our deadline until September 29, 2015. We have provided responses based on the information that we have to date, and will supplement timely at such time as additional information becomes available.

Addressing the Requests specifically, the City will produce responsive documents to Request No. 3-5 to the extent that they exist from 2000 to 2005. The City is limiting the temporal scope of its response to 2000 to 2005 because Plaintiff is not entitled to information from the years subsequent to the Chicago Police Department's investigation of Plaintiff. Any analyses, assessments and/or evaluations of the polygraph unit that may have taken place after Harris was charged and convicted is not relevant to the claims and defenses in this lawsuit. Similarly, the names of people who work in the polygraph unit, and complaints lodged against those employees, a decade after Harris was charged and convicted has no bearing on the claims or defenses in this case.

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Regarding Requests Nos. 6, 7, and 8, the City agrees to supplement its Responses by identifying the responsive documents, previously produced by the City, by bates number by Monday October 12, 2015.

Next, addressing Plaintiff's areas of dispute related to the City's answers and objections to Plaintiff's Interrogatories, the City will agree to supplement its answers to Interrogatories Nos. 1, 2, and 3, by Monday, October 12, 2015.

Presently we do not have information sufficient to substantively respond to Interrogatory Nos. 4-7. Since you would not agree to the extension we requested, we submitted our objections in order to preserve them. At such time as we receive information that allows us to respond further, we will supplement the responses.

Please let us know if you are available to discuss these issues by phone tomorrow at 9:00 a.m.

Best regards,

A handwritten signature in black ink, appearing to read 'K. Flynn', with a long horizontal stroke extending to the right.

Kyle L. Flynn

cc: **Hale Law LLC**
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Avi T. Kamionski
Shneur Z. Nathan
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